

REMARKS

Claims 1-20 are pending in the application and stand rejected.

Objections to the Specification

Applicants acknowledge the Examiner's objection, and respectfully submit that the application as filed does comport, in general, with the suggested arrangement. Thus, Applicants are of the opinion that further amendment of the specification is not warranted.

Rejection under 35 U.S.C §102

Claims 1-6, 9-15, 18 and 20 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,553,427 to Chang et al. In particular, the Examiner finds that, with regard to claim 1, Chang discloses all of the claimed limitations. Applicants have reviewed the reference with care, paying particular attention to the passages cited, and are compelled to respectfully disagree with the Examiner's characterization of this reference. To make the differences between the claimed invention and Chang clearer, Applicants have amended claim 1 to specifically recite that the formatter unit is for processing received messages to ensure that sent messages are in an appropriate format for the telecommunications service application, as recited in originally filed claim 16.

Chang does not disclose any software component, nor allude to a software component, that includes a unit for formatting received messages. Furthermore, the Examiner has failed to clearly and specifically point out where Chang discloses each and every claimed feature in accordance with 37 C.F.R. 1.104(c)2, but rather cites to certain portions of sentences in Chang without offering an explanation as to how these disclose the particular claimed limitation. For instance, with respect to claim 1, there is no indication of what features in Chang the Examiner considers to correspond to Applicants' claimed software component. With respect to Applicants' claimed software component "input for receiving messages" and software component "output for sending messages to a telecommunication service application," the Examiner directs Applicants to see Chang's "telecommunication service providers, such as service application programs" at

col. 3, lines 37-38 and “service application” at col. 21, line 38. As for the limitation that the “output comprises a message-based set of libraries capable of transmitting messages to the application,” the Examiner cites to Chang’s disclosure that “the INAP interface is a set of library routines that are shared by both TCAP server processes and by instances of service application programs” at col. 6, lines 34-37. Applicants thus understand the Examiner to assert that the “INAP interface” is the claimed software component output, which still begs the question, what is then the “software component” of which this “INAP interface” is a part of?

Regardless, the Examiner further cites to Chang’s “INAP_Operating class” at col. 21, lines 41-61, as disclosing Applicants’ “formatter unit for processing received messages.” But the INAP_Operating class simply refers to one of seven interface objects that are passed along as part of the INAP messages. Furthermore, there is nothing in Chang that discloses the INAP-Interface as processing these messages to ensure that sent messages are in an appropriate format for a telecommunications service application. The Examiner seems to discern such disclosure in Chang’s teaching that “[b]y using the INAP_Operation class, the service application program does not need to know about the data structure or field names of any INAP message type to retrieve or manipulate data fields in an INAP message.” With all due respect, this simply does not follow. Chang teaches that by using common INAP_Operation functions to construct INAP_Operation objects, the INAP_Interface allows a service application program to receive an INAP Message and then, using the same INAP_Operation, to retrieve or manipulate particular data fields in the INAP Message (please see col. 19, line 9 to col. 20, line 22 of Chang). A simple analogy to this is encoding a message then adding the encoding key to the message, sending the message to a receiver, and the receiver decoding the message with the decoding key that is appended to the encoded message. This is conceptually a completely different, and irrelevant, communication architecture when compared to Applicants’ invention. The sentence right before that cited by the Examiner, at col. 21, line 38, makes this clear: “[t]he INAP_Interface class allows the service application program to send and receive INAP message objects to the TCAP Server without knowledge of the transmitting mechanism.” Chang does not process the messages into an appropriate format. Rather, Chang encodes the messages in a certain format and passes the tools necessary to decode that format along with the messages to the receiver, so that the

receiver does not need to have stored any information regarding the encoding (i.e. “knowledge of the transmitting mechanism”).

In view of the above, Applicants respectfully submit that Chang is misapplied to the present invention, and that claim 1 is in fact patentable over Chang. Should the Examiner disagree, Applicants respectfully request that the Examiner clearly and specifically point out where Chang discloses each and every claimed feature in accordance with 37 C.F.R. 1.104(c)2.

Claims 2-6 and 9-15 depend from claim 1. In view of the above discussion, it is submitted that claim 1 is allowable, and for this reason claims 2-15 are also allowable.

Claims 18 and 20 are similar in scope to claim 1, and recite the limitation of formatting messages into different formats. As discussed above, Chang does not disclose nor make obvious such a limitation, and for this reason Applicants respectfully submit that claims 18 and 20 are also patentable over Chang.

Rejection under 35 U.S.C §103

Claims 7, 8, 16, 17 and 19 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Chang in view of WO 00/48368 to Corneliussen.

Claims 7 and 8 depend from claim 1. “If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious.” *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Therefore, in light of the above discussion of claim 1, Applicants submit that claims 7 and 8 are also allowable.

Claims 16, 17 and 19 are similar in scope to claim 1, and recite the limitation of formatting messages into different, or appropriate, formats. As discussed above, Chang does not disclose nor make obvious such a limitation, and for this reason Applicants respectfully submit that claims 16, 17 and 19 are also patentable over Chang.

Regarding the prior art made of record by the Examiner but not relied upon, Applicants believe that this art does not render the pending claims unpatentable.

In view of the above, Applicants submit that the application is now in condition for allowance and respectfully urge the Examiner to pass this case to issue.

Kindly note the new Attorney Docket Number for this case.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

I hereby certify that this correspondence is being deposited with the United States Post Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

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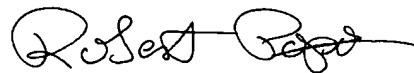


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Respectfully submitted,



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